

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN THE MATTER OF THE SEIZURE OF:

Up to \$15,000.00 in money, funds, and financial instruments deposited or credited to UMB Bank account #...8055 held in the name of Phillip Lee Williams & Pamela Kay Williams.

No. 4:20MJ6238 PLC

**FILED UNDER SEAL**

**MOTION FOR CONTINUED SEALING**  
**OF SEIZURE WARRANT DOCUMENTS**

COMES NOW the United States of America, by and through its attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Kyle T. Bateman, Assistant United States Attorney for said District and moves this Court for an order directing that the seizure warrant, along with its application, affidavit, and return, entered by this Court continue to be sealed until April 13, 2022, except for the limited purposes of providing same to defense counsel pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure.

In support of this Motion, the Government provides the following facts, establishing that (a) the government has a compelling interest in sealing the documents in question which outweighs the public's qualified First Amendment right of access to review those documents; and (b) no less restrictive alternative to sealing is appropriate or practical:

The facts submitted in the affidavit in support of the instant application have been determined as part of an ongoing investigation. Disclosure of the contents of the affidavit for the seizure warrant would identify individuals under investigation but not yet charged with an offense, and may also place the individuals identified in the affidavit in danger.

WHEREFORE, for the reasons stated above, the Government respectfully requests that the seizure warrant, along with its application, affidavit, and return, continue to be sealed until April 13, 2022.

Dated this 8<sup>th</sup> day of October, 2021

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Kyle T. Bateman

KYLE T. BATEMAN, #996646(DC)

Assistant United States Attorney

111 South 10th Street, Suite 20.333

Saint Louis, Missouri 63102

Telephone: (314) 539-2200

Facsimile: (314) 539-2777

[Kyle.Bateman@usdoj.gov](mailto:Kyle.Bateman@usdoj.gov)